

Exhibit 1

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New York, NY 10020-1605
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January 3, 2025

VIA FEDEX OVERNIGHT

Mohamed Sayed Ahmed Hassan
30 Bay 17th St, Apt 1
Brooklyn NY 11214

CHRISTOPHER T. COOK
christopher.cook@katten.com
212.940.6488 direct
212.940.8776 fax

**Re: *State Farm Mut. Auto. Ins. Co. v. Metro Pain Specialists P.C.*, 21-cv-5523 (E.D.N.Y.) –
Upcoming Deposition and Outstanding Discovery**

Dear Mr. Hassan:

We write regarding the Court's December 9, 2024 order, your deposition and overdue discovery responses. A copy of the order, which we previously mailed to you, is enclosed.

Pursuant to that order, you were required to: (1) provide written discovery responses and responsive documents to plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company's (collectively, "Plaintiffs") First Sets of Interrogatories and Requests for Production by December 24, 2024; and (2) appear for deposition on January 13, 2025 at the offices of Katten Muchin Rosenman, LLP, located at 50 Rockefeller Plaza, New York, NY 10020-1605.

To date, Plaintiffs have not received any written discovery responses or responsive documents from you, nor have Plaintiffs received any indication that you intend to attend the court-ordered deposition on January 13, 2025.

Please advise by 12 p.m. on January 7, 2025 whether (1) you plan to provide the outstanding discovery responses described in the Court's December 9 order; and (2) you will be attending the January 13, 2025 deposition. You may reach me by phone at (212) 940-6488 or by email at christopher.cook@katten.com.

If we do not hear from you by 12 p.m. on January 7, 2025, we will assume you will not be appearing at the deposition and do not intend to provide the outstanding discovery.

Please be aware that if you do not respond to this letter advising of your intention to produce discovery and appear for deposition, Plaintiffs will move for default judgment against you in this case.

Sincerely,

/s/ *Christopher T. Cook*

Christopher T. Cook

Encl. (12/9/2024 Order)

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

State Farm Mutual Automobile Insurance)
Company and State Farm Fire and Casualty)
Company,) Case No. 1:21-cv-05523-MKB-PK
)
Plaintiffs,)
) Hon. Margo K. Brodie
v.)
) Magistrate Peggy Kuo
Metro Pain Specialists, P.C. et al.,)
)
Defendants.)

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that pursuant to **Federal Rules of Civil Procedure 26** and 30, Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company, by and through their counsel, will take the deposition of Mohamed Sayed Ahmed Hassan, P.T. commencing at 9:30 a.m at the law firm of Katten Muchin Rosenman, LLP, 50 Rockefeller Plaza, New York, NY 10020-1605, on January 13, 2025 by an officer authorized by law to administer oaths. Pursuant to **Federal Rule of Civil Procedure 30(b)(3)(A)**, the deposition will be taken by stenographic and audiovisual means and may be used for all purposes contemplated under the Federal Rules of Civil Procedure.

SO ORDERED:

DATED: December 9, 2024

Peggy Kuo

United States Magistrate Judge

From: ecf_bounces@nyed.uscourts.gov
Sent: Monday, December 9, 2024 11:52 AM
To: nobody@nyed.uscourts.gov
Subject: Activity in Case 1:21-cv-05523-MKB-PK State Farm Mutual Automobile Insurance Company et al v. Metro Pain Specialists P.C. et al Scheduling Order

EXTERNAL EMAIL – EXERCISE CAUTION

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Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court
Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 12/9/2024 12:51 PM EST and filed on 12/9/2024

Case Name: State Farm Mutual Automobile
Insurance Company et al v. Metro Pain Specialists P.C. et al

Case Number: 1:21-cv-05523-MKB-PK <https://ecf.nyed.uscourts.gov/cgi-bin/DktRpt.pl?470307>

Filer:

Document Number: 646

Copy the URL address from the line below into the location bar of your Web browser to view the document:

https://ecf.nyed.uscourts.gov/doc1/123121987725?caseid=470307&de_seq_num=2540&magic_num=56120098

Docket Text:

SCHEDULING ORDER: The Notice of Deposition filed at [645-1] is so-ordered. Defendant Mohamed Sayed Ahmed Hassan, P.T. is ordered to sit for a deposition commencing at **9:30 a.m** on January 13, 2025 at the law firm of Katten Muchin Rosenman, LLP located at 50 Rockefeller Plaza, New York, NY 10020-1605. **Defendant Mohamed Sayed Ahmed Hassan, P.T.** is directed to provide written discovery responses and responsive documents to cure any deficiencies detailed in Plaintiffs' [552] letter motion no later than **December 24, 2024.** Ordered by Magistrate Judge Peggy Kuo on 12/9/2024. (RO)

1:21-cv-05523-MKB-PK Notice has been electronically mailed to:

Steven J. Harfenist (Terminated) sharfenist@hkplaw.com, kpassero@hkplaw.com, lmoller@hkplaw.com

Thomas A. Leghorn tleghorn@londonfischer.com Lloyd M. Eisenberg leisenberg@eisenbergcarton.com Ruya Carton rcarton@eisenbergcarton.com Michael A. Zimmerman litigation@zimmlaw.com, wholeoffice@zimmlaw.com

Benjamin Max Pinczewski bmp@psattorney.com, shpel@aol.com

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1:21-cv-05523-MKB-PK Notice will not be electronically mailed to:

Nile Rehab Physical Therapy, P.C.

Primavera Physical Therapy, P.C.

Damian Peter Conforti

Mandelbaum Barrett PC
3 Becker Farm Road, Suite 105
Roseland, NJ 07068

Jelani Wray

Raouf Akl, P.T.
70 Guernsey Drive
New Windsor, NY 12553

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP NYEDStamp_ID=875559751 [Date=12/9/2024] [FileNumber=19560734-0]
[9164239dcbe2141f785fa0afe0ce85251f74057a4e12d1a1e664a878ba2c9f70b96be18ddb00eea6b8fdb026b4f32920dda
eacc3155421af67cedbe46b476c20]]

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Signed for by:	Signature not required	Delivery Location:	
Service type:	FedEx Priority Overnight		
Special Handling:	Saturday Delivery; Residential Delivery		Brooklyn, NY,
		Delivery date:	Jan 4, 2025 13:16

Shipping Information:

Tracking number:	283995255064	Ship Date:	Jan 3, 2025
		Weight:	0.5 LB/0.23 KG

Recipient:	Shipper:
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Brooklyn, NY, US,	NEW YORK, NY, US,
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Reference	277811.00873-44208
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